

In response to your letter dated September 15, 2009 (reference: May Monthly Report, 4/01/09 to 4/30/09), requesting additional information regarding the procedures currently used by the Republican Party of Virginia (RPV) for the acceptance of corporate in-kind contributions, we provide the following explanation:

The RPV's normal and usual practice with respect to the acceptance of corporate in-kind contributions associated with an allocable administrative or fund-raising activity is to transfer from its federal account to its nonfederal account the value of the federal share of the in-kind contribution upon receipt of that in-kind contribution. In the context of a fund-raising event, the RPV determines the federal share based on the funds received ratio, i.e., the anticipated percentage of funds received through that event that qualify as federal funds. In the context of allocable administrative activity, the RPV determines the federal share based on the applicable fixed percentage ratio for that election cycle.

With respect to the specific transfer you mention, made by the RPV on April 6, 2009, in the amount of \$18,467, from the RPV's federal account to its nonfederal account, the RPV Treasurer in a letter to the FEC General Counsel, delivered by hand on April 23, 2009, fully disclosed the circumstances regarding the transfer and requested guidance on what additional reporting steps, if any, may be necessary including the amendment of affected disclosure reports and the reconciliation of federal and nonfederal accounts. Upon receipt of that guidance, the RPV will act promptly to comply.
